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*Counsel to the Official Committee of Unsecured
Creditors*

**THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, et al., ¹	§	Jointly Administered
	§	
Debtors.	§	Case No. 15-31858-hdh-11
	§	
	§	

**MONTHLY APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF
PACHULSKI STANG ZIEHL & JONES LLP, AS LEAD COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR THE PERIOD FROM JUNE 1, 2015 THROUGH JUNE 30, 2015**

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective <i>nunc pro tunc</i> to May 12, 2015

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309.

Period for which Compensation and Reimbursement is Sought:	June 1, 2015 – June 30, 2015 ²
Amount of Fees Sought as Actual, Reasonable and Necessary:	\$292,140.75
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$29,223.94

This is a: x monthly interim final application.

PRIOR APPLICATIONS FILED

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
06/30/15	05/12/15 - 05/31/15	\$286,679.50	\$5,132.32	\$286,679.50	\$5,132.32
06/30/15 (Committee Member Expenses)	05/12/15 - 05/31/15	N/A	\$3,331.97	N/A	\$3,331.97

PSZ&J PROFESSIONALS

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Robert J. Feinstein	Partner 2001; Member NY Bar since 1982	\$995.00	88.10	\$87,659.50
Robert J. Feinstein	Travel Time billed at ½ rate	\$497.50	18.00	\$ 8,955.00
Debra I. Grassgreen	Partner 1997; Member CA Bar since 1994; Member FL Bar since 1992	\$925.00	4.40	\$ 4,070.00
Jeffrey N. Pomerantz	Partner 1995; Member CA Bar since 1989	\$895.00	32.40	\$28,998.00
Jeffrey N. Pomerantz	Travel Time billed at ½ rate	\$447.50	7.70	\$ 3,445.75
John A. Morris	Partner 2008; Member NY Bar since 1991	\$875.00	61.90	\$54,162.50
John A. Morris	Travel Time billed at ½ rate	\$437.50	20.60	\$ 9,012.50
Maxim B. Litvak	Partner 2004; Member CA Bar since 2001; Member TX Bar since 1997	\$795.00	5.50	\$ 4,372.50

² The applicant reserves the right to include any time expended in the time period indicated above in future application(s) if it is not included herein.

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Shirley S. Cho	Of Counsel 2009; Member CA Bar 1997; Member NY Bar 2002	\$750.00	16.10	\$12,075.00
Maria A. Bove	Of Counsel 2001; Member NY Bar since 2001	\$725.00	57.70	\$41,832.50
Gail S. Greenwood	Of Counsel 2009; Member CA Bar 1994	\$675.00	27.40	\$18,495.00
Jason H. Rosell	Associate 2010; Member of NY Bar 2011; Member of CA Bar 2010	\$525.00	3.70	\$ 1,942.50
Leslie A. Forrester	Law Library Director	\$325.00	2.10	\$ 682.50
Patricia J. Jeffries	Paralegal 1999	\$305.00	41.90	\$12,779.50
Denise A. Harris	Paralegal 2001	\$295.00	12.40	\$ 3,658.00

Grand Total: \$292,140.75
Total Hours: 399.90
Blended Rate: \$730.53

COMPENSATION BY CATEGORY

Project Categories	Total Hours	Total Fees
Asset Analysis/Recovery	38.30	\$29,931.50
Asset Disposition	34.80	\$31,142.00
Avoidance Actions	3.10	\$ 2,196.50
Bankruptcy Litigation	106.00	\$81,640.00
Case Administration	7.70	\$ 3,805.00
Claims Administration/Objection	.80	\$ 417.00
Compensation of Professionals	.80	\$ 377.50
Compensation of Professionals (Others)	4.50	\$ 1,859.50
Employee Benefits/Pension	6.80	\$ 4,547.50
Financial Filings	12.70	\$ 6,314.50
Financing	27.50	\$22,620.50
General Creditors' Committee	14.90	\$12,110.00
Hearing	20.40	\$17,990.00
Meeting of Creditors	.30	\$ 298.50
Operations	9.50	\$ 8,348.50
Plan & Disclosure Statement	16.10	\$15,398.50
PSZ&J Compensation	12.50	\$ 6,096.50
PSZ&J Retention	4.40	\$ 2,747.00
Retention of Professionals	32.30	\$22,708.00
Stay Litigation	.20	\$ 179.00
Travel (Non-working billed at ½ rate)	46.30	\$21,413.25
Total	399.90	\$292,140.75

EXPENSE SUMMARY

Expense Category	Service Provider³ (if applicable)	Total Expense
Air Fare	Coach	\$10,670.20
Airport Parking	Actual Cost	\$ 210.29
Auto Travel	Actual Cost	\$ 480.14
Working Meals	Actual Cost	\$ 44.20
Conference Call	Actual Cost	\$ 186.29
Federal Express	Actual Cost	\$ 229.51
Hotel Expense	Actual Cost	\$ 1,645.05
Lexis/Nexis Legal Research	Actual Cost	\$ 80.14
Pacer – Court Research	Actual Cost	\$ 757.10
Postage	Actual Cost	\$ 189.72
Reproduction Expense	@ \$.10 per page	\$ 1,813.20
Reproduction/Scan Copy	@ \$.10 per page	\$ 388.50
Transcript	Actual Cost	\$ 8,620.82
Travel Expense	Actual Cost	\$ 987.00
Westlaw – Legal Research	Actual Cost	\$ 2,921.78
Total		\$29,223.94

³ PSZ&J may use one or more service providers. The service providers identified herein below are the primary service providers for the categories described.

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**THE UNITED STATES BANKRUPTCY COURT
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**MONTHLY APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF
PACHULSKI STANG ZIEHL & JONES LLP, AS LEAD COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
FOR THE PERIOD FROM JUNE 1, 2015 THROUGH JUNE 30, 2015**

Pursuant to sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* signed on June 10, 2015 (the “Interim Compensation Procedures Order”), Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”), lead counsel to the

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309.

Official Committee of Unsecured Creditors (the “Committee”), hereby submits its Monthly Application for Compensation and for Reimbursement of Expenses for the period from June 1, 2015 through June 30, 2015 (the “Application”).

By this Application PSZ&J seeks a payment of \$233,712.60 (80% of the allowed fees of \$292,140.75) and reimbursement of \$29,223.94 (100% of the allowed expenses) for the period June 1, 2015 through June 30, 2015 (the “Interim Period”).

Background

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. On April 30, 2015 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Court”), thereby commencing these chapter 11 cases.

3. On May 5, 2015, the Court entered an order jointly administering these cases for procedural purposes only under lead case 15-31858 (the “Case”). The Debtors continue in possession of their property and are operating and managing their business as debtors in possession pursuant to the provisions of 11 U.S.C. §§ 1107(a) and 1108. No trustee or examiner has been appointed in the Case.

4. On May 12, 2015, the United States Trustee for Region 6 appointed the Committee to represent the interests of all unsecured creditors in this Case pursuant to section 1102 of the Bankruptcy Code. The members appointed to the Committee are: (i) Baker Petrolite

Corporation; (ii) Cynthia Garcia; (iii) MMI Services, Inc.; (iv) Pacific Petroleum California, Inc.; and (v) SCS Engineers.

5. On June 10, 2015, the Court signed the Interim Compensation Procedures Order,² authorizing certain professionals (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Interim Compensation Procedures Order provides, among other things, that a Professional having incurred fees in excess of \$10,000 may submit monthly fee applications no later than the twenty-fifth (25th) day of each month following the month for which compensation is sought to the Notice Parties. If a Professional has not incurred fees in excess of \$10,000.00 in a given month, on or before the twenty-fifth (25th) day of each month following such month, that Professional may subsequently submit a consolidated Monthly Fee Application for a particular month or months.

6. After fourteen (14) days following service of a Monthly Fee Application and absent any objections thereto, each Professional may file a certification of no objection or a certification of partial no objection with the Court, after which the Debtors are authorized to pay each Professional eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in each Monthly Fee Application, except as provided in paragraph 2(b) of the Interim Compensation Procedures Order.

7. Commencing with the period ending August 31, 2015 and at three-month intervals thereafter, each of the Professionals shall file with the Court an interim application for

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Interim Compensation Procedures Order.

allowance of the amounts sought in its Monthly Fee Applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

8. On or about June 24, 2015, this Court signed the *Order Authorizing and Approving the Retention of Pachulski Stang Ziehl & Jones LLP as Lead Counsel to the Official Committee of Unsecured Creditors Effective as of May 12, 2015* (the “Retention Order”) [Docket No. 321]. The Retention Order authorized PSZ&J to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**PSZ&J’S APPLICATION FOR COMPENSATION AND
FOR REIMBURSEMENT OF EXPENSES**

Compensation Paid and Its Source

9. All services for which PSZ&J requests compensation were performed for or on behalf of the Committee. PSZ&J has received no payment and no promises for payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between PSZ&J and any other person other than the partners of PSZ&J for the sharing of compensation to be received for services rendered in this Case. PSZ&J has not received a retainer in this Case.

Fee Statement

10. The fee statement for the Interim Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each attorney and paraprofessional during the Interim Period. To the best of PSZ&J’s knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules and the Interim Compensation Procedures Order. PSZ&J’s time reports are entered into PSZ&J’s

accounting system either directly by the attorney or paraprofessional performing the services or by an administrative assistant under the direction of the attorney or paraprofessional. The time reports are organized on a daily basis. PSZ&J is particularly sensitive to issues of “lumping” and, unless time was spent in one time frame on a variety of different matters for a particular client, separate time entries are set forth in the time reports. PSZ&J’s charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code. PSZ&J has reduced its charges related to any non-working “travel time” to fifty percent (50%) of PSZ&J’s standard hourly rate. To the extent it is feasible, PSZ&J professionals attempt to work during travel.

Actual and Necessary Expenses

11. A summary of actual and necessary expenses incurred by PSZ&J for the Interim Period is attached hereto as part of **Exhibit A**. PSZ&J customarily charges \$0.10 per page for photocopying expenses and \$0.10 per page for scanning and printing charges. PSZ&J’s photocopying machines automatically record the number of copies made when the person that is doing the copying enters the client’s account number into a device attached to the photocopier. PSZ&J summarizes each client’s photocopying charges on a daily basis.

12. PSZ&J charges \$1.00 per page for out-going facsimile transmissions. There is no additional charge for long distance telephone calls on faxes. The charge for outgoing facsimile transmissions reflects PSZ&J’s calculation of the actual costs incurred by PSZ&J for the machines, supplies and extra labor expenses associated with sending telecopies and is reasonable in relation to the amount charged by outside vendors who provide similar services. PSZ&J does not charge the Committee for the receipt of faxes in this Case.

13. With respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), PSZ&J charges the standard usage rates these providers charge for computerized legal research. PSZ&J bills its clients the actual amounts charged by such services, with no premium. Any volume discount received by PSZ&J is passed on to the client.

14. PSZ&J believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, PSZ&J believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

Summary of Services Rendered

15. The names of the timekeepers of PSZ&J who have rendered professional services in this case during the Interim Period are set forth in the attached **Exhibit A**. PSZ&J, by and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, advised the Committee on a regular basis with respect to various matters in connection with the Debtors' Case, and performed all necessary professional services which are described and narrated in detail below. PSZ&J's efforts have been extensive due to the size and complexity of the Debtors' Case.

Summary of Services by Project

16. The services rendered by PSZ&J during the Interim Period can be grouped into the categories set forth below. PSZ&J attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another

category. These services performed, by categories, are generally described below, with a more detailed identification of the actual services provided set forth on the attached **Exhibit A**.

Exhibit A identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

A. Asset Analysis/Recovery

17. Time billed to this category relates to the analysis of the Debtors' assets, including, among other things: (i) the review and analysis of the Nabors litigation; (ii) the review and analysis of claims against Scott Wood and his affiliates; and (iii) the preparation of a subpoena for Scott Wood and his affiliates.

Fees: \$29,931.50 Hours: 38.30

B. Asset Disposition

18. Time billed to this category relates to, among other things: (i) the review and analysis of the Debtors' bid procedure orders; (ii) preparation with respect to and attendance at the deposition of John Young of Conway Mackenzie, Inc.; (iii) preparation of an objection to the Debtors' motion to approve bid procedures; and (iv) review and comments on revised bidding procedures.

Fees: \$31,142.00 Hours: 34.80

C. Avoidance Actions

19. Time billed to this category relates to research and analysis regarding applicable state statutes of limitations on fraudulent transfers.

Fees: \$2,196.50 Hours: 3.10

D. Bankruptcy Litigation

20. Time billed to this category relates to, among other things: (i) conducting discovery with respect to the Debtors' contested DIP financing and sale procedures motions; (ii) review and analysis of the Debtors' and CLMG Corp.'s objections to the Committee's change of venue motion and preparation of a reply thereto; (iii) review and analysis of R. Kelly Plato's, Scott Wood's, Mick Solimene's and Christopher Miller's depositions; (iv) preparation for June 11, 2015 hearing; and (v) participation in settlement discussions.

Fees: \$81,640.00 Hours: 106.00

E. Case Administration

21. This category relates to work regarding administration of this Case. During the Interim Period, the Firm, among other things: (i) reviewed correspondence and pleadings and forwarded them to appropriate parties; (ii) maintained a memorandum of critical dates; (iii) maintained document control; (iv) maintained service lists; and (v) conferred and corresponded regarding case administration issues.

Fees: \$3,805.00 Hours: 7.70

F. Claims Administration and Objections

22. Time billed to this category relates to the review of the claims bar date order, the calendaring of deadlines, and correspondence with the Committee regarding same.

Fees: \$417.00 Hours: .80

G. Compensation of Professionals

23. Time billed to this category relates to the review and analysis of the Interim Compensation Procedures Order.

Fees: \$377.50 Hours: .80

H. Compensation of Professionals (Others)

24. Time billed to this category relates to the preparation of Committee member expense reimbursement requests, and the review of and correspondence regarding Conway Mackenzie monthly fee statements.

Fees: \$1,859.50 Hours: 4.50

I. Employee Benefits/Pension

25. Time billed to this category relates primarily to the review and analysis of the Debtors' motion to approve a key employee incentive program.

Fees: \$4,547.50 Hours: 6.80

J. Financial Filings

26. Time billed to this category relates to the review and analysis of the Debtors' schedules of assets and liabilities and statements of financial affairs.

Fees: \$6,314.50 Hours: 12.70

K. Financing

27. Time billed to the category relates to, among other things: (i) preparation of an objection to the Debtors' DIP financing motion; (ii) revisions to the DIP financing order; (iii) the review and analysis of the Debtors' and CLMG Corp.'s replies with respect to DIP financing and sale motions; (iv) participation in settlement negotiations regarding DIP financing and bid procedures motions; and (v) attention to discovery requests relating to DIP financing and bid procedures.

Fees: \$22,620.50 Hours: 27.50

L. General Creditors' Committee/Meeting of Creditors

28. These categories include work related to general Committee and creditor issues. During the Interim Period, the Firm, among other things: (i) prepared a summary of substantive pleadings for Committee review; (ii) participated in Committee meetings; (iii) reviewed and revised the Committee's confidential information motion; (iv) created a public creditor site for access to key documents filed in the Case; and (v) corresponded with Chevron regarding case status.

Fees: \$12,408.50 Hours: 15.20

M. Hearing

29. Time billed to this category relates to preparation for and attendance at various hearings held in the Case.

Fees: \$17,990.00 Hours: 20.40

Fees: \$298.50 Hours: .30

N. Operations

30. Time billed to this category relates to, among other things: (i) addressing issues relating to the Debtors' motion to pay royalty claims; (ii) review of the Debtors' revised cash management order; (iii) preparation of a response to the Debtors' critical vendor motion; and (iv) discussions regarding negotiations of a revised critical vendor order.

Fees: \$8,348.50 Hours: 9.50

O. Plan and Disclosure Statement

31. Time billed to this category relates to work relating to plan of reorganization issues. During the Interim Period, the Firm, among other things:

(i) communicated with counsel and Committee members regarding plan issues; (ii) reviewed, analyzed and revised a plan term sheet; and (iii) conferred with counsel regarding plan term sheet issues.

Fees: \$15,398.50 Hours: 16.10

P. PSZ&J Compensation

32. Time billed to this category relates to the preparation of the Firm's first monthly fee statement.

Fees: \$6,096.50 Hours: 12.50

Q. PSZ&J Retention

33. Time billed to this category relates to the preparation of the Firm's retention application and order.

Fees: \$2,747.00 Hours: 4.40

R. Retention of Professionals

34. Time billed to this category relates to, among other things: (i) discussions and analyses of AP Services' retention application; (ii) discovery relating to AP Services' retention application; (iii) preparation of the Committee's objection to the retention of AP Services; (iv) addressing issues relating to Conway MacKenzie's retention; and (v) preparation of a revised order regarding Conway MacKenzie's retention.

Fees: \$22,708.00 Hours: 32.30

S. Stay Litigation

35. The Firm billed minimal time to this category relating to correspondence with counsel regarding J-5's stay relief motion.

Fees: \$179.00 Hours: .20

T. Travel

36. During the Interim Period, the Firm incurred non-working time while traveling on case matters. Such time is billed at one-half the normal rate.

Fees: \$21,413.25 Hours: 46.30

Valuation of Services

37. Attorneys and paraprofessionals of PSZ&J expended a total 379.40 hours in connection with their representation of the Committee during the Interim Period, as follows:

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Robert J. Feinstein	Partner 2001; Member NY Bar since 1982	\$995.00	88.10	\$87,659.50
Robert J. Feinstein	Travel Time billed at ½ rate	\$497.50	18.00	\$ 8,955.00
Debra I. Grassgreen	Partner 1997; Member CA Bar since 1994; Member FL Bar since 1992	\$925.00	4.40	\$ 4,070.00
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Leslie A. Forrester	Law Library Director	\$325.00	2.10	\$ 682.50
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Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Denise A. Harris	Paralegal 2001	\$295.00	12.40	\$ 3,658.00

Grand Total: \$292,140.75
Total Hours: 399.90
Blended Rate: \$730.53

38. The nature of work performed by these persons is fully set forth in

Exhibit A attached hereto. These are PSZ&J's normal hourly rates for work of this character.

The reasonable value of the services rendered by PSZ&J for the Committee during the Interim Period is \$292,140.75.

39. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by PSZ&J is fair and reasonable given (a) the complexity of the Case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, PSZ&J has reviewed the requirements of Local Rule 2016 and the Interim Compensation Procedures Order and believes that this Application complies with such rule and order.

WHEREFORE, PSZ&J respectfully requests that, for the period June 1, 2015 through June 30, 2015, an interim allowance be made to PSZ&J for compensation in the amount

of \$233,712.60 (80% of the allowed fees of \$292,140.75) and reimbursement of \$29,223.94
(100% of the allowed expenses).

Dated: July 29, 2015

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/s/ Jeffrey N. Pomerantz

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